

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Moiton GRANTED.
Hearing reset for
3/25/15 at 1:30 p.m.

UNITED STATES OF AMERICA,
)
)
v.)
)
JUSTIN FIFE,)

) No. 3:14-cr-00069
)
Judge Trauger



SECOND MOTION TO CONTINUE
SUPPRESSION HEARING

This case is set for a suppression hearing on Thursday, March 5, 2015 at 1:30 p.m. Counsel moves, at the behest of his client and also for the reasons set forth below to continue the suppression hearing.

1. Counsel filed an Amendment based on his understanding of the instructions of the client but has encountered a great number of questions raised by his client which require Counsel to answer in order to render effective assistance in advising Mr. Fife. This will need time to research, write, and meet with Mr. Fife. Counsel's intended time for this work was halted by inclement weather (as Mr. Fife is housed in Kentucky and Counsel lives in Clarksville and the Marshals were limited in transport.) The time was also hijacked from Counsel by events in case # 14-152, U.S. v. Perez, et al; wherein a release hearing was unexpectedly impressed upon Counsel during the last weeks prior to a scheduled trial (before this court and currently set for February 3, 2015, two days prior to the suppression hearing in this case.)

2. Counsel has not received a response to the above said amended motion and anticipates that the the United States will wish time to do so. Counsel is attempting to contact the U.S. Attorney assigned to this case to obtain the U.S. position.

3. Counsel is not ready to conduct the suppression hearing in a manner which Mr. Fife believes is effective and in accord with Mr. Fife's express wishes. Mr. Fife has expressed his believe that additional time to confer and study will cure this apparent mis-connect.